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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

_____)	
JEFFERY D. ALBRIGHT, et al.)	
)	
Plaintiffs)	
v.)	Case No. 1:CV-00-0878
)	Judge Sylvia H. Rambo
DANIEL A. VIRTUE, et al.)	
)	
Defendants.)	
_____)	

**DEFENDANT ABF FREIGHT SYSTEM, INC.'S
MOTION FOR ENLARGEMENT OF TIME**

Defendant ABF Freight System, Inc. ("ABF"), hereby moves for an enlargement of time for all Defendants to file their Reply Briefs in Support of Summary Judgment until January 13, 2003, and states as follows:

1. This is Defendant ABF's first request for an enlargement of time.
2. Counsel for ABF and Counsel for the Union Defendants did not anticipate Plaintiffs obtaining an extension of time to file their Opposition to

Summary Judgment, which in turn delayed the time for all Defendants to file their Reply Briefs from December 27, 2002 until January 8, 2003.

3. Counsel for ABF and Counsel for Union Defendants have previously scheduled conflicts that necessitate a brief extension of time, until January 13, 2003, to file their Reply Briefs.

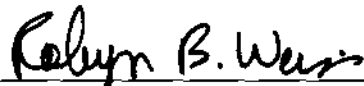
4. The brief extension will not affect the Court's schedule, as the Court has already suspended all other pretrial deadlines and removed the case from the February 2003 trial calendar. See Order dated December 10, 2002.

5. Counsel for Plaintiffs and Counsel for Defendants Daniel Virtue, Local 776, International Brotherhood of Teamsters, and International Brotherhood of Teamsters concur with this Motion.

WHEREFORE, ABF respectfully requests that this Court grant ABF's Motion for Enlargement of Time and issue an Order granting all Defendants until January 13, 2003 to file their Reply Briefs in Support of Summary Judgment.

Dated: December 23, 2002

Respectfully submitted,



Joseph H. Santucci, Jr. (*pro hac vice*)

Robyn B. Weiss (*pro hac vice*)

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ABF Freight System, Inc.

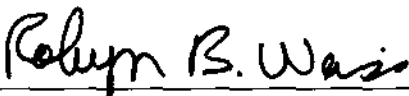
CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December 2002, a copy of the foregoing Defendant ABF's Motion for Enlargement of Time was served via first-class mail, postage prepaid, on the following:

Robert S. Mirin
AHMAD & MIRIN
8150 Derry Street, Suite A
Harrisburg, PA 17111

James A. McCall
Special Counsel
INTERNATIONAL BROTHERHOOD OF
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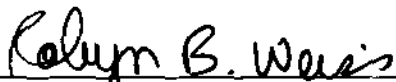
Ira Weinstock
Jason Weinstock
IRA WEINSTOCK, P.C.
800 N. 2nd Street
Harrisburg, PA 17102



Robyn B. Weiss

CERTIFICATE OF CONCURRENCE/NON-CONCURRENCE

I, Robyn B. Weiss, certify that on December 23, 2002, I contacted Robert S. Mirin, counsel for Plaintiff, who informed me that Plaintiffs concurred in this Motion. On the same date, I contacted Jason Weinstock, Counsel for Virtue, Local 776, International Brotherhood of Teamsters and the International Brotherhood of Teamsters, who informed me that Defendants Virtue, Local 776, and the IBT concur in this motion.


Robyn B. Weiss